



POST OFFICE BOX 94 • GREENWOOD, CALIFORNIA 95635 • TELEPHONE 530/823-1662
FACSIMILE 530-823-3137

October 25, 2001

American River Pump Station Project
Draft EIS/EIR Comments
Surface Water Resources, Inc.
2031 Howe Avenue
Sacramento, CA 95825

RE: Disclosed impacts and other unknown impacts: We request that these analyses be included in the EIS/EIR being conducted by the Bureau of Reclamation (BOR) and the Placer County Water Agency (PCWA)

Dear PCWA and BOR staff:

A

Asbestos is mentioned as a possible significant impact, yet the document only states that the Placer County Air Pollution Agency is the agency that "will" investigate air pollution for this project. El Dorado County is a adjacent County that has its own Asbestos Rules and regulations that are not mentioned in reference to the methods used to mitigate the potential impacts of Asbestos as well as those applicable rules of the CA Air Resources Board. It is our comment that the that these Rules must be included during the construction and included in the final vegetation plan.

B

We also comment that onsite air pollution monitoring equipment be placed at locations throughout the site(both in the canyon and on the upper rims of the project construction site). This equipment will be monitored daily and the results recorded so that a true onsite evaluation will be available to access the mitigation measures that are intended to control air pollution impacts caused as a result of ongoing activities at the construction site. If the daily testing depicts a low level of impacts then, the testing should be changed to a weekly schedule. The draft documents do not include the cumulative impacts from the project (mixing of PM and other toxic discharges from equipment) and the windblown pollutants imported from

C

- A. El Dorado County APCD was consulted during preparation of the Draft EIS/EIR (page 3-298); however, the air quality impact analysis focused on potential effects on sensitive receptors. No sensitive receptors were identified in El Dorado County within ½ mile of the project site so the analysis focused on sensitive receptors identified within Placer County. Please refer to Response L-8.A. Please refer to Response L-8.C regarding the Proposed Project's compliance within the referenced asbestos rules. Establishment of a vegetative cover is one option for post-construction stabilization of disturbed areas and will be employed as determined appropriate at the project site. Please also refer to Master Response 3.1.5, Project Area River Restoration.
- B. Air quality monitoring and inspections are included in the Mitigation Plan (Final EIS/EIR, Appendix D), as required by Placer and El Dorado county APCDs.
- C. With the exception of NO_x emissions during construction, the Proposed Project would not generate air pollutant emission levels in excess of the local APCD significance thresholds. As such, the Proposed Project's incremental contribution to the cumulative impacts would be considered less-than-significant for ROG and PM₁₀.

As discussed in the Draft EIS/EIR (page 3-307), the lead agencies acknowledge that the Proposed Project would result in a potentially considerable contribution to the cumulative NO_x emissions condition. As part of the air emissions control efforts, Reclamation's construction contractor would implement all feasible NO_x emission reduction measures. These measures would be implemented in consultation with Placer APCD and El Dorado APCD.



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the Pacific Coast cities and industries including those of the San Joaquin Valley area and the Sacramento areas.

We comment that these should be included so that there is no net gain in existing pollutants as a result of the onsite and offsite operations of this project. One of the offsite significant long-term impacts that was not mentioned was the increase in water based traffic that utilize unpaved roads, to access the American River (Drivers Flat Road, lower portion of Mammoth Bar OHV road system and river access points, Sliger Mine Road ect.) these locations have the potential to significantly increase at least the PM and other toxic emissions by the use of these unpaved, dusty under maintained roads.

There is also a significant amount of silt and sedimentation associated with the use of these unpaved roads which is a significant long term offsite impact. We comment that these potentially significant impacts need to be included in the EIS/EIR for the PCWA pumping station project.

We comment that through out the EIR/EIS a statement is made that the CA State Parks (CASP) and the BOR will in the near future update the Interim Management Plan for the Auburn State Recreation Area. It is our opinion that this a bifurcation of the projects significant impacts. This is a delegating of the lead agencies responsibility to access and mitigate all significant impact that are a part of its project description. This provides the lead agency way to deny the public the opportunity to partake in a meaningful way on the "whole of the project". It will also allow a large project to be broken down into smaller projects that may have a less than significant impact when considered individually instead of a part of the "whole project" We comment that all of the projects impacts be included in this project so that the public will have the opportunity to have a meaningful impact on the results of this project without allowing a piece meal to occur.

This project should include impacts to the citizens of El Dorado County and the sensitive receptors (school aged children) in at least two schools in the Cool area, and a large number of older retired citizens in the Cool area (Auburn Lake Trails) (ALT) which shall be impacted by this project. We

- D. Reclamation and CDPR will evaluate the long-term impacts associated with future changes to facilities throughout the Auburn SRA. The Proposed Project would not be expected to affect use at locations identified by the commenter, other than providing an alternative river access location.
- E. As noted in the Draft EIS/EIR and in Master Response 3.1.6, Public River Access Features, the proposed public river access features were incorporated into the Proposed Project as a short-term interim solution to mitigate potential public health and safety impacts created by closing the Auburn Dam construction bypass tunnel and rewatering the North Fork American River channel near Auburn. The incorporation of these features is within the lead agencies' discretion over Proposed Project elements. The development of these features as part of the Proposed Project does not affect future decision making relevant to other activities within the Auburn SRA or at the project site. Reclamation and CDPR have plans to initiate their comprehensive planning studies, including public involvement activities, for the entire Auburn SRA in 2002.
- F. The El Dorado County Air Pollution Control District (APCD) recommends evaluating sensitive receptors located within a 1,000-foot radius of project construction activity. Placer County APCD recommends consideration of sensitive receptors within one-quarter mile (1,320 feet).

The Draft EIS/EIR considers the potential for air quality impacts upon receptors within one-half mile of the proposed construction activity, and therefore encompasses a larger region and provides a more conservative evaluation of potential project impacts than required by the El Dorado County APCD or the Placer County APCD. The community of Cool is located over 2 miles east of the proposed project area, and therefore residents and schools within the community do not fall within the sensitive receptor study area, as recommended by these agencies.

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G further request and comment that the air pollution station located in Cool (ALT) CA be upgraded to detect a full range of air borne pollutants including PM. This will provide residents on both side of the project the opportunity to access the impacts along with the regulatory agencies.

Recreation impacts to trails and trail crossing above and below the proposed project site have not totally been included in this project's EIR/EIS.

The sites that we have a initial concern are the Tevis crossing located at Poverty Bar. This crossing as well as others is used year round and will be impacted by additional flow releases needed to supply PCWA Pumping Station. Other sites located above the project site is the crossing at Sliger Mine, Fords Bar, Cock Robin Point Trail below San Ramon Hill.

H Below the project site is a river crossing used just below Cardiac Hill near Oregon Bar. These trail river crossings have been in use for generations, yet have not been mentioned in the EIS/EIR. We comment and request that a analysis be done on these and any other crossings which may be impacted by the additional release of water needed to supply the PCWA project. Some of these if not all may be subject to Federal Law RS 2477. We comment and request that a analysis be included as to the standing of these trails.

I We comment that the County of El Dorado has trail plan that is not referred to in the EIR/EIS. This trail plan and the El Dorado County General Plan rely on some of these trails for the recreational requirements for the residents and guests of El Dorado County yet the only mention of a General Plan is on Air Pollution and Noise. We request and comment that a through review be preformed of the afore mentioned plans for the potential impacts that may arise from the lack of any mitigations for impacts which may occur as a result of this project.

J We comment that he PCWA claims that the Auburn-to-Cool Trail (Coffer Dam) loss is a significant but unavoidable impact of the river restoration and pump station project. We comment that the PCWA and the BOR need

3

G. CARB installed the Cool monitoring station to measure ozone levels in El Dorado County based on the results of a 1990 Sacramento Air Quality Field Study that indicated the potential for high ozone levels near Cool. The need for PM₁₀ monitoring at Cool was not identified in this study or since then. CARB has no plans to upgrade the station as it finds existing monitoring locations are better-suited for capturing high PM levels and that the Cool site would not substantially improve their data or planning efforts. It is outside the responsibilities of the lead agencies to pursue such action.

H. It is recognized that people cross the river in many locations throughout the Auburn SRA. CDPR does not officially designate the locations cited in the comment letter as official trail crossings of the river and does not maintain any specific goals or objectives for the use or management of use in those areas that differ from other areas in the Auburn SRA. CDPR is committed to providing the public with information about the inherent dangers associated with river recreation of all types, including swimming, boating, and river crossings, while also providing access and opportunities for the public to enjoy the river in a safe manner. CDPR does not recommend, condone, or prohibit individuals' attempts to cross the river at these locations; however, crossing the river is done at one's own risk. The referenced federal law RS 2477 is not known to apply to the crossings identified in the comment letter. Please refer to Master Response 3.1.1, Auburn-to-Cool Trail, for more information regarding trail access and possible river crossings.

CDPR finds that there are sufficient trail miles and access locations for the public to enjoy the North and Middle forks of the American River without crossing. Sliger Mine and Cock Robin Point are accessible by roads or trails on either side of the Middle Fork. The Western States Trail crossing at Poverty Bar may be considered easier to ford than other locations; however, as indicated previously, CDPR does not consider this an official river crossing location. It is recognized that river flows are regulated at the Oxbow Powerhouse to permit crossing in this location during specially-permitted annual trail events. Maximum increase in releases from Oxbow would be 100 cfs during summer when flows would generally be otherwise low. The project would not result in increased flows below the pump station.

Response I

The El Dorado County General Plan lists non-motorized transportation systems as one of six closely related components that play a vital role in the County's attempt to achieve a balanced and sustainable transportation system. Goal 3.11 of the plan seeks to "develop and implement a comprehensive bikeway, hiking, and equestrian trails plan that maximizes the opportunities for non-motorized transportation and meets the recreation and local community needs of El Dorado County residents." The El Dorado County Trails Master Plan includes goals, policies, and implementation strategies to guide trail development and maintenance throughout the County. The Master Plan does not identify detailed trail alignments but has objectives and policies related to the goals of creating a network of trails to serve multiple users and provide inter-connections throughout the county.

The Placer County General Plan states that one of its recreational goals is "To develop a system of interconnected hiking, riding, and bicycling trails and paths suitable for active recreation and transportation and circulation." Multi-purpose trails also are linked to Goal 3.D, "To provide a safe, comprehensive, and integrated system of facilities for non-motorized transportation."

The City of Auburn distinguishes between independent trails and pedestrian/cyclist trails in its 1994 General Plan. The plan recognizes three trail types for Pedestrian/Cyclist trails. One of these, a "route," uses existing roadway and is not designated as a separate facility. It is signed for user information as well as to inform the driving public that the road is a designated route for non-motorized transportation.

Neither the El Dorado County General Plan, the El Dorado County Trails Master plan, Placer County General Plan, nor the City of Auburn General Plan specifically refer to the Auburn-to-Cool Trail or its use designation within the project study area or elsewhere.

The general plan goals and policies information related to trails is included in the Final EIS/EIR, Chapter 3.0, Section 3.8.2.2, Applicable Laws, Ordinances, Regulations. This information does not alter the conclusions presented in the Draft EIR/EIS.



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J (cont)

to include the construction of a bridge spanning the American River in their plan. We further comment that there is a need to leave a dirt trail along side the roads with adequate construction standards to protect the recreational users that require dirt trails. We comment that these trails must have a sufficient buffer distance from the paved roadways for safety. (See El Dorado County Trails Plan for example)

The Coffey Dam site is one of the few places where several trails merge and provide access to other trail systems (the Western States Trail in Auburn, the Olmstead Trail in Cool, and the Maidu and Folsom area trails). Most people feel that if the PCWA river project doesn't include a bridge in their plan now that it will never happen and we will lose the Coffey Dam area trails, three of our best training hills, and a major trail system connection FOREVER.

We comment that to not include at this time any decisions which will be made in the foreseeable future to CASP and or BOR would be a bifurcation of the project. (Please see our previous comments on bifurcation i/e Piece Mealing of a project.) The loss of this trail and the other afore mentioned trails/crossings would be inconsistent with the El Dorado County General Plan and the El Dorado County Trails Plan.

Several thousand hikers, outdoor enthusiasts, equestrians, mountain bikers, and runners use these trails annually. If the Auburn-to-Cool Trail is closed, the treacherous canyon trail to 'No-Hands Bridge' (Western States Trail) will become overcrowded - presenting a seriously dangerous situation. The interdiction of water based recreational users as a direct result/impact of the PCWA project will cause a conflict with existing user groups.

We comment that conflicts with other prior/existing groups will need to be resolved. We here by request that this conflict be mitigated through the inclusion of a bridge to replace the trail at the Coffey Dam. This trail was not designed to handle the kind of traffic that the Coffey Dam trails can. The trails are narrow and the drop-offs are steep, rocky, and several hundred feet high. People and horses will be at a much greater risk for potentially

J. Please refer to Master Response 3.1.1, Auburn-to-Cool Trail.



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deadly accidents involving collisions and falls.

J (cont)

The Auburn-to-Cool Trail loss is not just a trail, but also a merging of 3 canyon hills where athletes have been training for years. Runners and equestrians will no longer have these hills for training for the world famous 100 mile Western States run, the 100 mile Tevis endurance race, and other events. Auburn is proud to host the finish lines of both of these and other prestigious races. We comment that there has not been any analysis as to the economics losses that will occur as a result of these trail impacts now and into the future. We comment and request that this analysis be included in the FEIR.

Mountain biking access to the American River Canyon below Auburn is already limited. In fact, the Auburn-to-Cool trail is the only access they have to the trails in Cool from Auburn. It is not fair to take their only access route away from them. The canyon represents many user groups that include water use AND land use. The PCWA project needs to support canyon user groups and recognize the value of keeping the canyon access available.

K

Currently a volunteer mounted unit patrols the Coffey Dam area. Equestrians will no longer have access to the area as the PCWA plan includes paved roads on the Auburn side and piled river rock from the excavation on the Cool side. Who is willing to take on the expense and responsibility for patrolling this area when it becomes not so horse friendly? We comment that the inclusion of a bridge into project will provide the ability a safety and enforcement element in the case of a medical emergency in this section of the canyon.

L

We comment that the potentially significant impacts associated with the loss of the wildlife corridor/corridors between El Dorado and Placer Counties for the movement of wildlife through the Cofferdam area, including upstream and downstream areas has not been adequately analyzed. The higher river flows that are mentioned as a requirement for the PCWA/Georgetown Divide Public Utility District (GDPUD) diversions must be include in the analyses. These analyses must include the

M

K. Please refer to Master Response 3.1.1, Auburn-to-Cool Trail.

L. Please refer to Master Response 3.1.12, Project Area Wildlife.

M. The Draft EIS/EIR includes a qualitative assessment of the potential impacts associated with future increases in water supply diversions from the American River at the project site, including consideration of higher releases from Ralston Afterbay that may affect the Middle Fork American River. Evaluation of the Proposed Project assumes diversion of up to 100 cfs for use by PCWA. The cumulative analysis including an assumed increased diversion of up to 225 cfs to meet future demands from PCWA (100 cfs) and GDPUD (25 cfs). At this time however, it is unknown whether either PCWA or GDPUD would obtain additional future water supplies from the American River pump station location. Future environmental documentation to evaluate specific project impacts would be required prior to initiation of a pump station expansion project.

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M (cont)

maximum amount of water which may be added to the American River flows to satisfy the possible future diversions of both the PCWA and GDPUD. There is a migratory bird refuge site located just below the project site.

N

Members of our group have observed this site including the migrating bird wildlife. We request that these analyses be included in the EIS/EIR being conducted by the Bureau of Reclamation and the Placer County Water Agency

**K
(Repeat)**

Most people want to share in the joy and celebration of opening the river back to its natural course. We are asking PCWA and the BOR, to do the right thing and not take away the use of precious and beautiful canyon trails from our community. This can be achieved by building a bridge - a small price to pay when compared to the overall \$31 million project budget. A small price to pay compared to the permanent loss of trails that thousands of people have been using for years.

We comment that there may be the opportunity to alter slightly the location of the a bridge crossing to replace the present crossing at the site of the present trail crossing at the site of the destroyed coffer dam. We comment that if the site upstream of the present site would be able to connect with a trail access to the Knickerbocker Trail and possibly allow for a resumption of trail use at a earlier time and provide for significant economic savings. We comment and request that a committee of trail users, BOR, PCWA and CASP to investigate these alternatives. The afore mentioned down stream crossing also may be another alternative crossing opportunity with the same economic, visual and social benefits.

Thank you for this opportunity to provide written comments, please include the comments that have previously submitted by our representative Mr. Steven Proe including oral comments that were transcribed at the PCWA Public Hearing on Oct 11, 2001. If you have any questions on any of the comments or if our representative can be of further assistance on this project please do not hesitate to contact him. Contact by phone is 530-823-

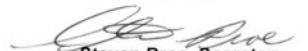
- N. The lead agencies are unaware of any officially designated or protected migratory bird refuge along the North Fork American River in the project study area. There is a sign along Auburn-Folsom Road in the City of Auburn that is believed to be a promotional statement for the city, and not a reference to a specific designated refuge area. Anderson Island Natural Preserve, located within the Folsom Lake State Recreation Area is a designated State Natural Preserve. Herons and egrets have been known to roost on Anderson Island (which at some lake levels is a peninsula). However, Anderson Island is located downstream of Rattlesnake Bar on the North Fork arm of Folsom Lake, well below the project area.



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1662, fax 530-823-3137, E-Mail trails@aaahawk.com at P.O. Box #94,
Greenwood, CA 95635

Thank You


Steven Proe, Secretary
El Dorado County Taxpayers
For Quality Growth

L-29

Dear Bureau: L-29

Please keep the Auburn-to-Cool trail open if the tunnel is closed for the pump station project. Include a bridge in the EIS/EIR ~~as~~ mitigation, and plan for cross-river access.

Thank you very much.

A. Please refer to Master Response 3.1.1, Auburn-to-Cool Trail.

L-30



**COMMENT CARD
PLACER COUNTY WATER AGENCY/U.S. BUREAU OF RECLAMATION**

**PCWA AMERICAN RIVER PUMP STATION AND RIVER RESTORATION PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT**

NAME:	Barbara Jick
ADDRESS:	125 Del Monte Way
CITY/STATE/ZIP:	Auburn, CA 95603
BUSINESS AND/OR HOME PHONE/FAX:	(530) 823-1034
ORGANIZATION (IF APPLICABLE):	
COMMENTS:	
A	I favor the American River Pump Station Project as proposed. The installment of a permanent PCWA pump station on the American River is long overdue. The pump station should be located in the area originally proposed by PCWA which would entail closure of the diversion tunnel; as this is the most efficient location for pumping PCWA's entitled water out of the River.
B	I would like to see a bridge constructed to maintain access from Auburn to the Cool Trail. This issue is secondary to the primary issue of fulfilling the government's commitment to PCWA to provide a permanent pump station facility.

PLEASE USE THIS TO SUBMIT YOUR COMMENTS ABOUT THE DRAFT EIS/EIR. YOU CAN SEND ADDITIONAL COMMENTS TO:
DRAFT EIS/EIR COMMENTS, SURFACE WATER RESOURCES, INC., 2031 HOWE AVENUE, SUITE 110, SACRAMENTO, CA 95825
JUST FOLD THIS SELF-ADDRESSED SHEET INTO THIRDS, SEAL, STAMP, AND MAIL. THANK YOU.

☒ Please check here if you would like to be on the project mailing list.

A. Project support noted.

B. Please refer to Master Response 3.1.1, Auburn-to-Cool Trail.

L-31



PLACER COUNTY WATER AGENCY/U.S. BUREAU OF RECLAMATION

**PCWA AMERICAN RIVER PUMP STATION AND RIVER RESTORATION PROJECT
DRAFT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT**

NAME:	William Gore
ADDRESS:	PO BOX 8088
CITY/STATE/ZIP:	Auburn, Ca. 95603
BUSINESS AND/OR HOME PHONE/FAX:	(530) 273-2899
ORGANIZATION (IF APPLICABLE):	
COMMENTS:	
I feel that before any changes are made to the current course of the river that:	
1) The current recreational activities in the canyon be taken into consideration. (Hikers, Runners, Bikers, Horse Riders)	
2) Some type of bridge be in place before our trails are cut off.	
A bridge near the site that is now being used to cross the river.	
I feel that leaving the river as it is would be the best for the majority of the public.	

A. Please refer to Master Response 3.1.1, Auburn-to-Cool Trail.

B. Leaving the river "as is" would not meet the objectives of the lead or responsible agencies. Please refer to Master Response 3.1.4, Auburn Dam Construction Bypass Tunnel.